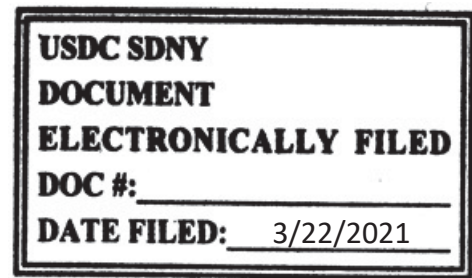


The Honorable Stewart D. Aaron, U.S.D.J.
March 12nd 2021



Date: 03/12/2021

VIA USDC ECF

To,

HON. Judge Stewart D. Aaron,

U.S. District Court, Southern District of New York,
500 Pearl Street,
New York, New York 10007

Re: Shukla vs. Deloitte Consulting LLP
Index No.: 1:19-cv-10578-AJN-SDA

Motion DENIED without prejudice. Plaintiff's motion is denied on the basis that Plaintiff, in violation of the Court's Individual Practices, failed to certify that he had met and conferred with Defendant prior to filing his motion. Moreover, as stated on the record during a telephone conference held on February 11, 2021 and in my Order of the same date (ECF No. 208), discovery deadlines other than those set forth in that 2/11/21 Order are adjourned *sine die*. SO ORDERED.

Dated: March 22, 2021

A handwritten signature in blue ink, appearing to be "Att C A".

Re: Letter Motion Requesting Court order on plaintiff's Eighth request for production of documents. Requesting court to order defendant to respond to and produce documents marked in plaintiff's Eighth request for production of documents by 04/05/21

Hon. Judge Stewart Aaron,

I'm the pro-se plaintiff on the above-mentioned matter. I'm filing this letter motion to request the court to order Defendant Deloitte Consulting LLP to respond to and produce documents identified in plaintiff's Eighth request for production of documents by 04/05/21.

Previously, on February 11th 2021, during the discovery teleconference call between the parties, the court ordered the plaintiff to produce seven new categories of documents requested and identified by the defendant. The defendant cleverly turned a forum identified for raising discovery disputes, into a forum for raising new discovery request. However, the plaintiff did not raise any new requests or issues that were not already served and known to the defendant.

On March 2nd 2021, the court further granted extension to the defendant to respond to the outstanding requests over plaintiff's objections by April 5th 2021.

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On March 8th 2021, the plaintiff served his Eighth Request for production of documents to the defendant. [**Exhibit A**]

Because of the discrepancies between the old requests that were made by the plaintiff in year 2019, and the new requests recent made by the defendant just prior to the teleconference call in year 2021; the plaintiff requests the court to grant this letter motion request, and order the defendant Deloitte Consulting LLP to produce documents identified on plaintiff's Eighth Request for production of documents by the April 5th 2021 deadline.

The court order will be mutually beneficial to both the parties for the following reasons:

- (a) The plaintiff was ordered to respond to defendant's new requests for production by April 5th 2021, however, the plaintiff was not given an opportunity to raise such new requests before or at the discovery dispute conference dated February 11th 2021,
- (b) The defendant raised seven new categories of discovery request for the February 11th 2021 conference call, but plaintiff raised none,
- (c) Plaintiff's Eighth request for production of documents can easily be consolidated into seven new categories of discovery requests, just like defendant's February 11th 2021 conference call request, and
- (d) Based on the objections raised by the plaintiff on his letter to the Judge dated 03/02/21 and the following court order on the issue (doc# 217), both parties would be given an equal opportunity to respond to the outstanding discovery items on an equal footing based on the same set of issues - like the outstanding items on plaintiff's Third Amended Complaint, and other and further important issues, by the April 5th 2021 deadline.

Thank you for your time and assistance in this matter.

Sincerely,
Ashu Shukla
Plaintiff
Princeton, NJ 08540
ashu.shukla@gmail.com

(cc) Defendant Attorneys via ECF & Mail